

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

|                             |   |                        |
|-----------------------------|---|------------------------|
| IN RE: JEREMY P. WAGNER and | : | CHAPTER 13             |
| WHITNEY L. WAGNER           | : |                        |
| Debtor(s)                   | : |                        |
|                             | : |                        |
| JACK N. ZAHAROPOULOS        | : |                        |
| STANDING CHAPTER 13 TRUSTEE | : |                        |
| Movant                      | : |                        |
|                             | : |                        |
| vs.                         | : |                        |
|                             | : |                        |
| JEREMY P. WAGNER and        | : |                        |
| WHITNEY L. WAGNER           | : |                        |
| Respondent(s)               | : | CASE NO. 1-20-bk-03573 |

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 24<sup>th</sup> day of November, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. § 1325(a)(3) in that it has not been proposed in good faith. Base plan should be no less than \$12,877.80.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 24th day of November, 2021, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Sara Austin, Esquire  
226 E. Market Street, Suite 2  
York, PA 17403

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee